

Before the

**FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Petition for Declaratory Ruling Regarding)	WT Docket No. 14-228
Applicability of the IntraMTA Rule to)	
LEC-IXC Traffic)	

COMMENTS OF THE ALASKA TELEPHONE ASSOCIATION

The Alaska Telephone Association ('ATA') files Reply Comments in this proceeding in response to the Commission's Public Notice and in support of the Petition for Declaratory Ruling filed by the LEC Petitioners ('Petition'). ATA's membership includes local exchange carriers ('LECs'), commercial mobile radio service ('CMRS') providers, and interexchange carriers ('IXCs'). ATA member companies rely on the principles of the IntraMTA rule as it has been understood and practiced for nearly 20 years to bill each other for traffic carried. These revenues are essential to provision of both interstate and intrastate service in Alaska and should not be disrupted.

ATA member companies bill IXCs for traffic exchanged over long distance trunks, ordered as switched access according to interstate and intrastate tariffs¹. In 2009 the State of Alaska enacted intrastate access charge reform and required IXCs to reduce intrastate calling rates to the end user at parity with interstate rates². This reform was based upon years of complex analysis and evaluation of the impacts on consumers and providers and has resulted in benefit to Alaska consumers and carriers³. Interstate reform is progressing according to the Rules adopted in the USF/ICC Reform Order.⁴

Alaska is unique in having no access tandems. Such tandems were historically provided by Regional Bell Operating companies or GTE. Alaska has no current or historic RBOC, GTE or other ILEC tandem switches. In the Lower 49 states, interexchange carriers, wireless carriers, VoIP carriers, and local carriers can exchange long distance, interMTA, intraMTA, and local traffic through mutual interconnection at an access tandem. In Alaska, this alternative is not available. Rather, interexchange carriers have built facilities to each LEC local exchange to receive and deliver calls over switched access

¹ The majority of ATA member companies are issuing carriers in FCC Tariff No. 5 and RCA Tariff No. 999 listing interstate and intrastate access services and rates.

² See Regulatory Commission of Alaska Docket R-09-003.

³ See Interexchange Carrier Rate Parity Reports filed with the Regulatory Commission of Alaska pursuant to Alaska Administrative Code at 3 AAC 52.372(b).

⁴ USF/ICC Transformation Order beginning at Para. 736.

trunks. The enormous distances involved, the isolated nature of many local exchanges, the lack of road and rail systems to provide right of way and maintenance access for facilities between exchanges, the use of satellite service to provide connectivity, all dictated that service between exchanges be provided by interexchange carriers rather than local telephone companies. In addition, wireless carriers, as they have extended networks from their switches to remote towers, have deployed interconnection trunks to local exchange switches in those areas. Because Alaska is defined as a single MTA, intraMTA traffic includes calls reaching distances of up to 1800 miles between local exchanges.

Alaska's providers rely on a complex balance of tariffed rates, interconnection agreements and Alaska Universal Service Fund support to provide service across our state's vast distances and connect our consumers to the world. All Alaska providers rely on the predictability of the access charge regime, including the IntraMTA rule as it has been applied to date, to operate and deploy advanced networks. Denying the Petition would shift significant access charge revenue between parties without any corresponding alignment of costs. The magnitude and impacts of the potential re-assignment of revenue cannot be easily determined. CMRS traffic is not identified discretely when delivered to a LEC by an IXC via long distance trunks and may not be identifiable due to factors common across industry⁵ as well as unique to Alaska. Without detailed, complex analysis the impact of denying the Petition cannot even be estimated. However, given that the most recent FCC Local Telephone Competition report indicated that there are as many wireless phones as wireline access lines and VoIP phones in Alaska, the volume of this traffic is substantial. Denying the Petition would surely be disruptive and inject great uncertainty into Alaska's telecommunications markets.

⁵ See Comments of NTCA—The Rural Broadband Association; WTA—Advocates for Rural Broadband; The Eastern Rural Telecom Association; and The National Exchange Carrier Association; Inc., submitted February 9, 2015 at pages 9-11.

Alaska Telephone Association
Comments on Applicability of the IntraMTA Rule to LEC-IXC Traffic
March 10, 2015

ATA strongly recommends the Commission grant the Petition and continue to allow LECs to bill switched access charges on traffic delivered via trunks ordered as switched access service, as has been the practice for many years. Alaska consumers and providers benefit from the stable access charge regime as it exists today. The unintended consequences of denying the Petition and imposing a major transfer of revenues between providers are likely to be significant and disruptive.

Respectfully submitted,

Via ECFS 3/10/2015

Christine O'Connor
Executive Director
Alaska Telephone Association
oconnor@alaskatel.org

CC: Robert Pickett, Chairman Regulatory Commission of Alaska
Senator Lisa Murkowski
Senator Dan Sullivan
Representative Don Young